

THE HONORABLE TANA LIN

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
SEATTLE DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

ISHAN WAHI, NIKHIL WAHI, and
SAMEER RAMANI,

Defendants.

No. 2:22-cv-01009

**JOINT STIPULATED MOTION TO
EXTEND THE TIME TO RESPOND
AND TO EXPAND THE BRIEFING
PAGE LIMITS**

**NOTE ON MOTION CALENDAR:
20th day of October, 2022.**

JOINT STIPULATED MOTION TO EXTEND THE TIME
TO RESPOND AND TO EXPAND THE BRIEFING PAGE
LIMITS

CASE No. 2:22-cv-01009

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1 Plaintiff the Securities and Exchange Commission and Defendants Ishan Wahi, and
 2 Nikhil Wahi, by and through their undersigned counsel, stipulate to an extension of time within
 3 which Defendants may respond to Plaintiff's complaint and an expansion of the briefing page
 4 limits. The Parties agree that additional time and additional pages are in the interest of judicial
 5 economy. Plaintiff's 62-page Complaint raises complex issues of fact and law implicating the
 6 scope of SEC authority over novel cryptocurrencies. The legal complexity of the claims merits
 7 additional time and the additional pages to fully brief the questions presented for the Court's
 8 consideration.

9 The Parties therefore respectfully stipulate as follows:

- 10 1. The Complaint in this case was filed on July 21, 2022. (Dkt. #1).
- 11 2. Based on the service date, the deadline for Defendants to respond to the Complaint
 12 under Fed. R. Civ. P. 12(a)(1) was August 22, 2022. (Dkt. #7, #8).
- 13 3. The Parties agree the Defendants may have until December 1, 2022 to file a
 14 Response to the Complaint.
- 15 4. The Parties agree the Plaintiff may have until February 1, 2023, to file a Brief in
 16 Opposition.
- 17 5. The Parties agree the Defendants may have until March 3, 2023, to file a Reply.
- 18 6. Given the novelty and complexity of the Complaint's legal and factual allegations,
 19 and pursuant to LCR 7(f), the Parties agree to expand the page limit to the following:
 - 20 • Defendants' Joint Response to Complaint is expanded to 75 pages;
 - 21 • Plaintiff's Brief in Opposition is expanded to 75 pages;
 - 22 • Defendants' Joint Reply Brief is expanded to 25 pages.
- 23 7. Accordingly, the Parties stipulate that the requested extensions are supported by
 24 good cause and in the interest of judicial economy, in that they will allow defense counsel
 25 sufficient time to fully develop all applicable defenses to this action. The Parties respectfully ask
 26 the Court to expand the briefing page limit and adopt the following briefing schedule:
 27

Briefing	Date	Pages
Defendants' Response to Complaint	December 1, 2022	75 pages
Plaintiff's Brief in Opposition	February 1, 2023	75 pages
Defendants' Reply Brief	March 3, 2023	25 pages

8. The Parties have conferred on the possibility that the SEC may file an amended complaint in the coming weeks. In that event, to provide Defendants sufficient time to respond, the Parties may seek to amend these proposed dates.

9. The Parties further agree that discovery shall be stayed in this case until January 2, 2023, subject to further modification by the Court.

A proposed order is included.

DATED this 20th day of October, 2022.

SO STIPULATED.

Respectfully submitted,

/s/ James M. Burnham

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